



# **Air Quality Permitting Statement of Basis**

**January 12, 2006**

**Tier II Operating Permit  
No. T2-050040**

**Tyson Fresh Meats, Kuna  
Facility ID No. 001-00030**

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**FINAL**

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## **Acronyms, Units, and Chemical Nomenclature**

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
m	meter(s)
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	Potential to Emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
TSP	Total Suspended Particulate-
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 et seq *Rules for the Control of Air Pollution in Idaho (Rules)* for issuing Tier II operating permits.

## **2. FACILITY DESCRIPTION**

Tyson Fresh Meats, Inc (Tyson) in Kuna is a beef processing and rendering facility which processes about 225 head of cattle per hour. The cattle are butchered, cleaned, split in half, quickly chilled to about 31 degrees Fahrenheit (°F), and sent to Pasco, Washington, for further processing. The hides are removed and sent to Pacific Hides in Nampa. The contents of the stomach are removed and piped to a truck loadout. The rest of the animal parts are ground up and rendered. The rendered material is separated into liquid and solid products. The liquid, edible product is used for deep fat frying. The solid product is used for animal food. The blood is dried and used for animal feed.

## **3. FACILITY / AREA CLASSIFICATION**

Tyson is defined as a synthetic minor facility because without permit limits on the potential to emit the SO<sub>2</sub> emissions could exceed 100 tons per year. The AIRS classification is "SM80" because the potential to emit SO<sub>2</sub> is limited to 80% or greater of the applicable major source level, 100 T/yr.

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Ada County which is classified as attainment for PM<sub>10</sub> and CO, and unclassifiable for all other criteria pollutants.

The AIRS information provided in the appendix defines the classification for each regulated air pollutant at Tyson. This required information is entered into the EPA AIRS database.

## **4. APPLICATION SCOPE**

The facility has requested that the T/day throughput limits represent a monthly average for the Inedible/Blood System, Meat And Bone Meal Storage Silo And Loadout, Blood Silo. The facility has also requested to remove all existing permit conditions pertaining to the Hide-Up Puller as that emission unit has been removed. No increase in emissions have been requested.

### **4.1 Application Chronology**

August 16, 2005	DEQ received application.
August 22, 2005	DEQ declared application inactive due to workload constraints.
August 29, 2005	DEQ declared application active
September 29, 2005	DEQ declares application complete
December 9, 2005	Facility draft sent to Boise Regional Office
December 19, 2005	Facility draft sent to facility.
December 28, 2005	Comments received from the facility.
December 30, 2005	Comments received from Boise Regional Office

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the analysis conducted for this Tier II operating permit.

### **5.1 Equipment Listing**

The permitting action involves the removal of the Hide-Up Puller and changing monitoring requirements from daily to daily averaged monthly.

### **5.2 Emissions Inventory**

There is not an increase emissions associated with this permitting action. Therefore, an emissions inventory is not required.

### **5.3 Modeling**

A modeling analysis is not required for this permitting action because there is not an increase in emissions. Additionally, a modeling analysis is not required because the T/day throughput limits in the current permit represent maximum daily design capacity of the Inedible/ Blood System, Meat And Bone Meal Storage Silo And Loadout, Blood Silo, and monthly average T/day throughput limits are based on those design capacities.

### **5.4 Regulatory Review**

This section describes the regulatory review of the applicable air quality rules with respect to this Tier II operating permit.

IDAPA 58.01.01.404.04..... Permit Revision or Renewal

This rule establishes the requirements for Tier II operating permit revisions and renewals. Because emissions are not increasing, a public comment period is not required.

### **5.5 Fee Review**

A Tier II operating permit processing fee of \$500 is required for this permit revision.

## **6. PERMIT CONDITIONS**

This section describes only those permit conditions that have been revised, modified or deleted as a result of this permit action. All other permit conditions remain unchanged.

Existing Permit Section 5 Hide-Up Puller has been removed. All subsequent sections have been renumbered.

Existing Permit Conditions 5.5, 6.5, and 7.5 limit process throughputs to ton-per-day limits.

Revised Permit Conditions 5.5, 6.5, and 7.5 limit process throughputs to ton-per-day limits averaged monthly. The request was made by the applicant to reduce monitoring requirements. Emissions will not and cannot increase because the daily limits were derived from maximum hourly processing rates.

Existing Permit Conditions 5.12, 6.7, and 7.7 require daily monitoring and recordkeeping of the process throughput limits.

Revised Permit Conditions 5.12, 6.7, and 7.7 require monthly monitoring and recordkeeping of the process throughput limits to determine a daily average.

## **7. PUBLIC COMMENT**

A public comment period is not required for this permitting action because there is not an increase in emissions.

### **7.1 *Regional Facility Review of Draft Permit***

A facility draft permit was provided to the regional office on December 9, 2005. Comments were received and a response was sent to the Boise Regional office. The comments, however, were not incorporated into the permit because they were outside the scope of the permit revision.

### **7.2 *Facility Review of Draft Permit***

A facility draft permit was provided to the facility on December 19, 2005. Comments were received and incorporated into the permit.

## **8. RECOMMENDATION**

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue final Tier II Operating Permit No. T2-050040 to Tyson Fresh Meats of Kuna, Idaho.

ABC\sd                      Permit No. T2-050040

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## **APPENDIX**

### **AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM**

### AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO <sub>2</sub>	SM					SM80	U
NO <sub>x</sub>	B					U	
CO	B					N	
PM <sub>10</sub>	B					U	
PT (Particulate)	B					U	
VOC	B					U	
THAP (Total HAPs)	B						U
			APPLICABLE SUBPART				

**AIRS/AFS Classification Codes:**

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant, which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).